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APPENDIX

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 94 N 2782
(Consolidated with Civil Action No. 95 N 2916
for all purposes)

WILLIAM QUIGLEY AND DOROTHY QUIGLEY,
Plaintiffs,

v.

SAUL F. ROSENTHAL, IN HIS INDIVIDUAL CAPACITY AND IN HIS CAPACITY AS REPRESENTATIVE OF THE ANTI-DEFAMATION LEAGUE, AND THE ANTI-DEFAMATION LEAGUE, AND LEGAL-TEMP, INC., D/B/A ATTORNEYS SERVICE CENTER, INC.,
Defendants.

[Filed Apr. 28, 2000]

SPECIAL VERDICT FORM "A"

THE JURY MUST UNANIMOUSLY AGREE ON THE ANSWERS TO ALL OF THE QUESTIONS

I. DEFAMATION CONCERNING STATEMENTS MADE DURING THE PRESS CONFERENCE ON DECEMBER 7, 1994 – WILLIAM QUIGLEY

1. For each of the following statements, please state whether you find by a preponderance of the evidence that the statement was (a) defamatory as to William Quigley and, if so, (b) whether the defendants acted negligently in publishing the statement. If you answered yes to both (a) and (b) for any statement, please state whether defendants have proved by a preponderance of the evidence

whether that statement is substantially true as to William Quigley.

--- Almost immediately upon their arrival they became targets of a[n] . . . anti-Semitic campaign by their neighbors, William and Dorothy, known as Dee, Quigley.

(a) This statement is defamatory as to William Quigley — ___√___ YES ___ NO

(b) This statement was negligently published — ___√___ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES ___√___ NO

--- The purpose of this campaign – which Mrs. Quigley referred to as "Operation Aronson" – was to drive the Aronsons from their new home and neighborhood.

(a) This statement is defamatory as to William Quigley — ___√___ YES ___ NO

(b) This statement was negligently published — ___√___ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES ___√___ NO

--- . . . [W]hat we have here are dozens of instances of attempts to intimidate, threaten and do harm to the Aronsons and to conspire with others in the neighborhood to do the same.

(a) This statement is defamatory as to William Quigley — ___√___ YES ___ NO

(b) This statement was negligently published — ___√___ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES ___√___ NO

--- The Quigleys engaged in all of the following activities, among others.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- They threatened to burn a cross on the Aronson's property, planned to tape a facsimile of an oven door on their home, discussed plans to douse one of the Aronson children with a flammable liquid and to burn a scarecrow on their property.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- They have conspired with each other and others in the neighborhood to involve the homeowners association in driving the Aronsons out.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- They defamed and slandered the Aronsons to their neighbors by attributing false behavior to them.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- And, ultimately, they threatened to commit bodily harm against the Aronson family using the term "blow him away" and asking neighbors to help in acquiring hand grenades and dynamite.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- On one occasion, William Quigley sought to frighten Candice by driving his car at her at high speed while she was parked in her own vehicle. Swerving away at the last second to avoid a collision, Mr. Quigley and his wife later retold the story and bragged about his effort to their friends.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

2. If you answered "yes" to questions (a) and (b) for any one or more of the foregoing statements, and found that defendants did not prove their defense of substantial truth as to each of those statements, then your verdict must be for Mr. Quigley on his claims for defamation by publication of the Opening Statement, and you must find in his favor on this claim and against both defendants by answering "yes" below. Otherwise, you must find against Mr. Quigley on this claim, in which event you must answer "no" below:

We, the jury, find for William Quigley and against Saul F. Rosenthal and the Anti-Defamation League on William Quigley's claim for defamation:

YES: √ NO: ___

II. DEFAMATION CONCERNING STATEMENTS MADE DURING THE PRESS CONFERENCE ON DECEMBER 7, 1994 – DOROTHY QUIGLEY

1. For each of the following statements, please state whether you find by a preponderance of the evidence that the statement was (a) defamatory as to Dorothy Quigley and, if so, (b) whether the defendants acted negligently in publishing the statement. If you answered yes to both (a) and (b) for any statement, please state whether defendants have proved by a preponderance of the evidence whether that statement is substantially true as to Dorothy Quigley.

--- Almost immediately upon their arrival they became targets of a[n] . . . anti-Semitic campaign by their neighbors, William and Dorothy, known as Dee, Quigley.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- The purpose of this campaign – which Mrs. Quigley referred to as "Operation Aronson" – was to drive the Aronsons from their new home and neighborhood.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- . . . [W]hat we have here are dozens of instances of attempts to intimidate, threaten and do harm to the Aronsons and to conspire with others in the neighborhood to do the same.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- The Quigleys engaged in all of the following activities, among others.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- They threatened to burn a cross on the Aronson's property, planned to tape a facsimile of an oven door on their home, discussed plans to douse one of the Aronson children with a flammable liquid and to burn a scarecrow on their property.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- They have conspired with each other and others in the neighborhood to involve the homeowners association in driving the Aronsons out.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- They defamed and slandered the Aronsons to their neighbors by attributing false behavior to them.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- And, ultimately, they threatened to commit bodily harm against the Aronson family using the term "blow him away" and asking neighbors to help in acquiring hand grenades and dynamite.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- On one occasion, William Quigley sought to frighten Candice by driving his car at her at high speed while she was parked in her own vehicle. Swerving away at the last second to avoid a colli-

sion, Mr. Quigley and his wife later retold the story and bragged about his effort to their friends.

(a) This statement is defamatory as to Dorothy Quigley	√ YES	___ NO
(b) This statement was negligently published	√ YES	___ NO
(c) This statement is substantially true as to Dorothy Quigley	___ YES	√ NO

2. If you answered "yes" to questions (a) and (b) for any one or more of the foregoing statements, and found that defendants did not prove their defense of substantial truth as to each of those statements, then your verdict must be for Mrs. Quigley on her claims for defamation by publication of the Opening Statement, and you must find in her favor on this claim and against both defendants by answering "yes" below. Otherwise, you must find against Mrs. Quigley on this claim, in which event you must answer "no" below:

We, the jury, find for Dorothy Quigley and against Saul F. Rosenthal and the Anti-Defamation League on Dorothy Quigley's claim for defamation:

YES: √ NO: ___

III. DEFAMATION CONCERNING STATEMENTS MADE DURING THE GREG DOBBS SHOW ON DECEMBER 7, 1994 – WILLIAM QUIGLEY

1. For each of the following statements, please state whether you find by a preponderance of the evidence that the statement was (a) defamatory as to William Quigley and, if so, (b) whether the defendants acted negligently in publishing the statement. If you answered yes to both (a) and (b) for any statement, please state whether defendants have proved by a preponderance of the evidence whether that statement is substantially true as to William Quigley.

--- . . . [I]n October, the Aronsons became aware that the Quigleys were engaged in, in what I am describing as a campaign of anti-Semitism to try to drive the Aronsons out of the community.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- They were involved in trying to bring other neighbors into this process, conspiring and discussing with them possible violent acts.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- They used intimidation, ethnic intimidation, there was an attempted assault, vehicular assault. Mr. Quigley attempted to drive his car in a reckless manner and nearly struck Mrs. Quigley [sic] sitting in her car in front of her home, and then he bragged about this to Mrs. Quigley and to other people in their circle of confidantes.

(a) This statement is defamatory as to William Quigley	√ YES	___ NO
(b) This statement was negligently published	√ YES	___ NO
(c) This statement is substantially true as to William Quigley	___ YES	√ NO

--- . . . [T]here's slander and defamation, the Quigleys had made up stories and lies about the Aronsons attributing behavior to Mrs. Aronson, uh, uh, and to the family that is simply not true and then spread those lies throughout the community.

(a) This statement is defamatory as to William Quigley	√ YES	___ NO
(b) This statement was negligently published	√ YES	___ NO
(c) This statement is substantially true as to William Quigley	___ YES	√ NO

--- They had plans to uh, to burn a cross on the Aronsons' lawn.

(a) This statement is defamatory as to William Quigley	√ YES	___ NO
(b) This statement was negligently published	√ YES	___ NO
(c) This statement is substantially true as to William Quigley	___ YES	√ NO

--- They had talked about taping up a facsimile of an oven door on the side of the Aronsons' house.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- There had even been a discussion in one of the conversations about dousing one of the Aronson children with a flammable liquid.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- . . . [T]hey have discussed with their neighbors how to acquire weapons, uh, specifically hand grenades and dynamite.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- . . . [T]here are repeated instances that, that, uh, that we have available to us to demonstrate the animus that the Quigleys had towards the Aronsons. They make a lot of negative comments to

their neighbors and to each other about the Jews and the damned Jews.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- Mr. Quigley repeatedly has expressed his animus towards individuals of the Jewish faith, and he even talks about describing his lack of satisfactory career progress as attributable to the superior success of his Jewish colleagues, and he attributes their success to being part of a, of a, a boys network of Jews, who, uh, and I'm reading here a direct quote a little old boys network, you know, if you're Jewish and you give to charities and you get favors back and forth you get further up into the corporate structures.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- [T]his is months of, of efforts on the part of the Quigleys to scheme and plot and plan and bring a variety of neighbors into the process and to drive a car at someone to try and frighten them and to nearly crash into them and to talk about dousing their kids and calling the police and, and putting false charges out there that the Quigleys, that that the Aronsons are doing one thing or another that is absolutely false.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- . . . [T]he Aronsons have been concerned about the safety of their kids and, you know, have not permitted the kids the kind of freedom to go about doing what, what teenagers would normally want to be doing at this point in their life, because they're just concerned about the extent to which the Aronsons [sic] might do them, might do them bodily harm.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

--- The Aronsons haven't down [sic] anything, they simply moved into the house, and within weeks thereafter the Quigleys started this effort to get them thrown out of the neighborhood because they didn't want, as they referred to them, I can't even use the word because it's the "f" word, those "f" Jews in their community.

(a) This statement is defamatory as to William Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to William Quigley — ___ YES √ NO

2. If you answered "yes" to questions (a) and (b) for any one or more of the foregoing statements, and found that defendants did not prove their defense of substantial truth as to each of those statements, then your verdict must be for Mr. Quigley on his claims for defamation by publication of the statements made during the Greg Dobbs show, and you must find in his favor on this claim and against both defendants by answering "yes" below. Otherwise, you must find against Mr. Quigley on this claim, in which event you must answer "no" below:

We, the jury, find for William Quigley and against Saul F. Rosenthal and the Anti-Defamation League on William Quigley's claim for defamation:

YES: √ NO: ___

IV. DEFAMATION CONCERNING STATEMENTS MADE DURING THE GREG DOBBS SHOW ON DECEMBER 7, 1994 – DOROTHY QUIGLEY

1. For each of the following statements, please state whether you find by a preponderance of the evidence that the statement was (a) defamatory as to Dorothy Quigley and, if so, (b) whether the defendants acted negligently in publishing the statement. If you answered yes to both (a) and (b) for any statement, please state whether defendants have proved by a preponderance of the evidence whether that statement is substantially true as to Dorothy Quigley.

--- . . . [I]n October, the Aronsons became aware that the Quigleys were engaged in, in, what I am describing as a campaign of anti-Semitism to try to drive the Aronsons out of the community.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- They were involved in trying to bring other neighbors into this process, conspiring and discussing with them possible violent acts.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- They used intimidation, ethnic intimidation, there was an attempted assault, vehicular assault. Mr. Quigley attempted to drive his car in a reckless manger and nearly struck Mrs. Quigley [sic] sitting in her car in front of her home, and then he bragged about this to Mrs. Quigley and to other people in their circle of confidantes.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- . . . [T]here's slander and defamation, the Quigleys had made up stories and lies about the Aronsons attributing behavior to Mrs. Aronson, uh, uh, and to the family that is simply not true and then spread those lies throughout the community.

(a) This statement is defamatory as to Dorothy Quigley — ___ YES √ NO

(b) This statement was negligently published — ___ YES √ NO

(c) This statement is substantially true as to Dorothy Quigley — √ YES ___ NO

--- They had plans to uh, to burn a cross on the Aronsons' lawn.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- They had talked about taping up a facsimile of an oven door on the side of the Aronsons' house.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — •√ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- There had even been a discussion in one of the conversations about dousing one of the Aronson children with a flammable liquid.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- . . . [T]hey have discussed with their neighbors how to acquire weapons, uh, specifically hand grenades and dynamite.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- . . . [T]here are repeated instances that, that, uh, that we have available to us to demonstrate the animus that the Quigleys had towards the Aronsons. They make a lot of negative comments to

their neighbors and to each other about the Jews and the damned Jews.

(a) This statement is defamatory as to Dorothy Quigley ___ YES _√_ NO

(b) This statement was negligently published ___ YES _√_ NO

(c) This statement is substantially true as to Dorothy Quigley _√_ YES ___ NO

--- Mr. Quigley repeatedly has expressed his animus towards individuals of the Jewish faith, and he even talks about describing his lack of satisfactory career progress as attributable to the superior success of his Jewish colleagues, and he attributes their success to being part of a, of a, a boys network of Jews, who, uh, and I'm reading here a direct quote a little old boys network, you know, if you're Jewish and you give to charities and you get favors back and forth you get further up into the corporate structures.

(a) This statement is defamatory as to Dorothy Quigley _√_ YES ___ NO

(b) This statement was negligently published _√_ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley ___ YES _√_ NO

--- [T]his is months of efforts on the part of the Quigleys to scheme and plot and plan and bring a variety of neighbors into the process and to drive a car at someone to try and frighten them and to nearly crash into them and to talk about dousing their kids and calling the police and, and putting false charges out there that the Quigleys, that that the Aronsons are doing one thing or another that is absolutely false.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- . . . [T]he Aronsons have been concerned about the safety of their kids and, you know, have not permitted the kids the kind of freedom to go about doing what, what teenagers would normally want to be doing at this point in their life, because they're just concerned about the extent to which the Aronsons [sic] might do them, might do them bodily harm.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

--- The Aronsons haven't down [sic] anything, they simply moved into the house, and within weeks thereafter the Quigleys started this effort to get them thrown out of the neighborhood because they didn't want, as they referred to them, I can't even use the word because it's the "f" word, those "f" Jews in their community.

(a) This statement is defamatory as to Dorothy Quigley — √ YES ___ NO

(b) This statement was negligently published — √ YES ___ NO

(c) This statement is substantially true as to Dorothy Quigley — ___ YES √ NO

2. If you answered "yes" to questions (a) and (b) for any one or more of the foregoing statements, and found that defendants did not prove their defense of substantial truth as to each of those statements, then your verdict must be for Mrs. Quigley on her claims for defamation by publication of the statements made during the Greg Dobbs show, and you must find in her favor on this claim and against both defendants by answering "yes" below. Otherwise, you must find against Mrs. Quigley on this claim, in which event you must answer "no" below:

We, the jury, find for Dorothy Quigley and against Saul F. Rosenthal and the Anti-Defamation League on Dorothy Quigley's claim for defamation.

YES: √ NO: ___

V. FALSE LIGHT INVASION OF PRIVACY – WILLIAM QUIGLEY

1. Did the plaintiff William Quigley, prove each and every element of his claim of false light invasion of privacy against the defendants, the Anti-Defamation League and Saul F. Rosenthal?

ANSWER: YES (yes or no)

2. If you answered "yes" to the question above then your verdict must be for Mr. Quigley on his claims of False Light Invasion of Privacy, and you must find in his favor on this claim and against both defendants by answering "yes" below. Otherwise, you must find against Mr. Quigley on this claim, in which case you must answer "no" below:

We, the jury, find for William Quigley and against Saul F. Rosenthal and the Anti-Defamation League on William Quigley's claim of False Light Invasion of Privacy.

YES: √ NO: ___

VI. FALSE LIGHT INVASION OF PRIVACY – DOROTHY QUIGLEY

1. Did the plaintiff Dorothy Quigley, prove each and every element of her claim of false light invasion of privacy against the defendants, the Anti-Defamation League and Saul F. Rosenthal?

ANSWER: YES (yes or no)

2. If you answered "yes" to the question above then your verdict must be for Mrs. Quigley on her claim of False Light Invasion of Privacy, and you must find in her favor on this claim and against both defendants by answering "yes" below. Otherwise, you must find against

Mrs. Quigley on this claim, in which case you must answer "no" below:

> We, the jury, find for Dorothy Quigley and against Saul F. Rosenthal and the Anti-Defamation League on William Quigley's claim of False Light Invasion of Privacy.
>
> YES: √ NO: ___

VII. INVASION OF PRIVACY – WILLIAM QUIGLEY

1. Did the plaintiff, William Quigley, prove each and every element of his claim of invasion of privacy against the defendant, the Anti-Defamation League?

ANSWER: YES (yes or no)

2. If you answered "yes" to the question above then your verdict must be for Mr. Quigley on his claim of Invasion of Privacy, and you must find in his favor on this claim and against defendant Anti-Defamation League by answering "yes" below. Otherwise, you must find against Mr. Quigley on this claim, in which case you must answer "no" below:

> We, the jury, find for William Quigley and against the Anti-Defamation League on his claim of Invasion of Privacy.
>
> YES: √ NO: ___

VIII. INVASION OF PRIVACY – DOROTHY QUIGLEY

1. Did the plaintiff, Dorothy Quigley, prove each and every element of her claim of invasion of privacy against the defendant, the Anti-Defamation League?

ANSWER: YES (yes or no)

2. If you answered "yes" to the question above then your verdict must be for Mrs. Quigley on her claim of Invasion of Privacy, and you must find in her favor on this claim and against defendant Anti-Defamation League by answering "yes" below. Otherwise, you must find against Mrs. Quigley on this claim, in which case you must answer "no" below:

> We, the jury, find for Dorothy Quigley and against the Anti-Defamation League on her claim of Invasion of Privacy.
>
> YES: √ NO: ___

IX. FEDERAL WIRETAP ACT FOR "PROCURING" THE INTERCEPTION OF CORDLESS TELEPHONE CONVERSATIONS – WILLIAM QUIGLEY

1. Did the plaintiff, William Quigley, prove each and every element of his claim that the defendant, the Anti-Defamation League, "procured" the interception of his cordless telephone conversations on or after October 25, 1994 in violation of the Federal Wiretap Act?

ANSWER: NO (yes or no)

2. If you answered "yes" to the question above then your verdict must be for Mr. Quigley on his claim of violation of the Federal Wiretap Act for "procuring" the interception of the plaintiff's cordless telephone conversations on or after October 25, 1994, and you must find in his favor on this claim and against defendant Anti-Defamation League by answering "yes" below. Otherwise, you must find against Mr. Quigley on this claim, in which event you must answer "no" below:

> We, the jury, find for William Quigley and against the Anti-Defamation League on his claim of violation of

the Federal Wiretap Act for "procuring" the interception of his cordless telephone conversations on or after October 25, 1994.

YES:___ NO:√

X. FEDERAL WIRETAP ACT FOR "USING" THE INTERCEPTED CORDLESS TELEPHONE CONVERSATIONS – WILLIAM QUIGLEY

1. Did the plaintiff, William Quigley, prove each and every element of his claim that the defendant, the Anti-Defamation League, "used" the contents of his cordless telephone conversations intercepted on or after October 25, 1994 to file the Verified Complaint in violation of the Federal Wiretap Act?

ANSWER: YES (yes or no)

2. If you answered "yes" to the question above then your verdict must be for Mr. Quigley on his claim that the defendant, the Anti-Defamation League, "used" the contents of his cordless telephone conversations intercepted on or after October 25, 1994 to file the Verified Complaint in violation of the Federal Wiretap Act, and you must find in his favor on this claim and against defendant Anti-Defamation League by answering "yes" below. Otherwise, you must find against Mr. Quigley on this claim, in which event you must answer "no" below:

We, the jury, find for William Quigley and against the Anti-Defamation League on the claim that the defendant, the Anti-Defamation League, "used" the contents of his cordless telephone conversations intercepted on or after October 25, 1994 to file the Verified Complaint in violation of the Federal Wiretap Act.

YES:√ NO:___

XI. FEDERAL WIRETAP ACT FOR "PROCURING" THE INTERCEPTION OF CORDLESS TELEPHONE CONVERSATIONS – DOROTHY QUIGLEY

1. Did the plaintiff, Dorothy Quigley, prove each and every element of her claim that the defendant, the Anti-Defamation League, "procured" the interception of her cordless telephone conversations on or after October 25, 1994 in violation of the Federal Wiretap Act?

ANSWER: NO (yes or no)

2. If you answered "yes" to the question above then your verdict must be for Mrs. Quigley on her claim of violation of the Federal Wiretap Act for "procuring" the interception of her cordless telephone conversations on or after October 25, 1994, and you must find in her favor on this claim and against defendant Anti-Defamation League by answering "yes" below. Otherwise, you must find against Mrs. Quigley on this claim, in which event you must answer "no" below:

> We, the jury, find for Dorothy Quigley and against the Anti-Defamation League on her claim of violation of the Federal Wiretap Act for "procuring" the interception of her cordless telephone conversations on or after October 25, 1994.
>
> YES:___ NO:√